



Privacy Policy

Welcome to our privacy policy

We respect your privacy and are committed to protecting your personal information, which we call “personal data”. This privacy notice will tell you how we look after your personal data and about your privacy rights. It supplements any other notices and is not intended to override them.

We have tried to be brief and clear. We are happy to provide any additional information or explanation.

Who we are

Data Controller (Park Owner) (referred to as “we/us/our”):

Neil and Annette Osborne

Name or title of Data Protection Manager: **Neil and Annette Osborne**

Address: **Trevalgan Touring Park, Trevalgan, St Ives, Cornwall, TR26 3BJ**

Telephone: **+44 (0)1736 791892**

Email: **reception@trevalgantouringpark.co.uk**

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO) (www.ico.org.uk). We would appreciate the chance to deal with your concerns first.

Changes

This version was last updated on 11th December 2019. Please visit this page regularly to ensure you are aware of any changes that we may make to this policy.

It is important that the personal data we hold about you is accurate and current. Please keep us informed of any changes.

How we collect your personal data

You may give us data orally or by filling in an electronic form via our website or by corresponding with us by post, phone, email or otherwise, for example when you:

- enter into a contract with us or contact us about doing so;
- contact us about any contract we have with you;
- request marketing to be sent to you;
- give us some feedback.

We may also receive personal data about you from third parties and public sources, including other customers when they interact with us. We can only correspond with the person who has made the booking/contract.

The type of personal data we may collect

| Type of personal data | Why do we collect this personal data? |
|--|---|
| Name of the person making the booking (must be 18+ years). | To form a contract with you. |
| Contact details: – address – email address – telephone number. | To enable us to contact you in relation to confirming your booking, making additional payments, updating your booking with any agreed changes, sending you useful pre-arrival information, ascertaining your arrival time, any emergencies or issues while staying on site, requesting feedback at the end of your stay. |
| Car registration. | To enable access to the site via our secure barrier system. |
| Names and ages of additional adults (16+ years) staying on the pitch. | To ensure our ‘families and couples only’ policy is adhered to. |
| Names and ages of children staying on the pitch: infants (0-2 years), children (3-15 years). | To ensure age appropriate discounts are correctly applied to the booking. |
| Credit/debit card information. | To ensure age appropriate fees are applied to the booking. To help identify children who become separated from their parents/carers or disorientated during their stay so we can help to reunite them quickly. |
| | All online card payments are processed via SagePay’s secure portal. All payments over the phone are processed via SagePay’s secure portal – we do not record or retain any details in relation to your card payment. Face-to-face card payments are made via WorldPay and we retain the ‘merchant copy’ for accounting purposes adhering to current guidelines. |

How we use your personal data

We will only use your personal data when the law allows us to. We have set out below how and why we plan to use your personal data.

| Purpose/Activity | Lawful basis for processing including basis of legitimate interest |
|---|---|
| To register you with our business. | Performance of a contract with you. |
| To perform any contract with you including: (a) Managing payments, fees and charges (b) Collecting and recovering money owed to us (c) Addressing any breach. | (a) Performance of a contract with you. (b) Necessary for our legitimate interests (to recover debts due to us). (c) Necessary for our legitimate interests (to ensure compliance with contract terms). |
| To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Notifying you about changes to our business which are relevant to you. | (a) Performance of a contract with you. (b) Necessary to comply with a legal obligation. (c) Necessary for our legitimate interests (to keep our records updated and to study how people use our business). |
| To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data). | (a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise). (b) Necessary to comply with a legal obligation. |
| To make suggestions and recommendations to you about goods or services that may be of interest to you. | Necessary for our legitimate interests (to develop and grow our business). |

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Purpose/Activity continued

Asking you to partake in a review or complete a survey.

To deliver relevant website content to you and measure or understand the effectiveness of the advertising we serve to you.

Use data analytics to improve our website, products/services, marketing, relationships and experiences.

Lawful basis for processing including basis of legitimate interest continued

Necessary for our legitimate interests (to study how people use our business, to develop and grow our business).

Necessary for our legitimate interests (to study how people use our business, to develop and grow our business and to inform our marketing strategy).

Necessary for our legitimate interests (to define types of people for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).

Promotional offers and marketing

We do not send marketing communications unless a brochure has been requested. Our special offers are available to view via our website.

Opting out

Not applicable as we do not send marketing communications.

CCTV

We record images in certain public areas of the park for the purpose of crime detection and prevention. When necessary, these images will be shared with public authorities such as the police.

Cookies

For information about the cookies we use, and your ability to refuse them please refer to our separate cookie policy (full details are available in the downloads section of our website).

Change of purpose

Please note that we may process your personal data without your knowledge or consent where this is required or permitted by law.

However, if we need to use your personal data for a new purpose and the law allows us to do so, we will notify you and explain the legal basis for our actions.

Visitors to our website

If we want to collect personally identifiable information through our website, we will be up front about this.

When someone visits our website, we may use a third-party service to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone.

Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Social media

We manage our own social media accounts.

If you fail to provide personal data

If you do not provide personal data to us and this would prevent us from performing the contract we have or are trying to enter into with you, or place us in breach of the law, we may have to cancel our contract. We will notify you if this is the case.

Disclosures of your personal data

We may share your personal data with third parties to help us run our business or carry out our obligations to you:

| Name | Lawful basis for processing including basis of legitimate interest |
|--|---|
| Service providers for IT and system administration. | Performance of a contract with you. Necessary for our legitimate interests (performing the contract, using your data as we have described in this notice). |
| Our professional advisers including lawyers, bankers, auditors and insurers. | Necessary for our legitimate interests (complying with our legal obligations). |
| HM Revenue & Customs, regulators and other authorities. | Necessary for our legitimate interests (complying with our legal obligations). |

We may also share your personal data with any third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Where we store your personal data

The data that we collect from you may be transferred to, and stored at a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA, who work for, or on behalf of, us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers or on secure servers operated by a third party. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

How long will we use your personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

You can ask us about the retention periods for different aspects of your personal data by contacting our DPM.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Your legal rights

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law.

Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

No fee usually required. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

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We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.